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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Johnny Edward Hallum,)	Case No. 1:21-cv-00602-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
)	
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from June 6, 2022 to August 5, 2022, for Plaintiff to serve on defendant with Plaintiff's Opening Brief. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. As Counsel has reported previously in many other cases in this district, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022. Although it has been over two months, Counsel for Plaintiff continues to experience significant pain and the secondary

1 effects of medications. Counsel continues to work short periods throughout the day with
2 significant breaks throughout. Counsel continues to attend physical therapy four days a week.

3 Secondly, as this Court is well aware, Social Security case filings in federal court
4 increased due to a combination of factors including an increase in appeals council decisions and
5 an increase in hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-
6 place mandates, and Court ordered Stays, there were significant delays in producing transcripts.
7 In recent months, Counsel for the Plaintiff has received a greater-than-usual number of Answers
8 and Certified Administrative Records from defendant including over 78 cases from February
9 through April 2022.

10 For the weeks of May 30, 2022 and June 6, 2022, Counsel for Plaintiff has 23 merit
11 briefs, and several letter briefs and reply briefs. For the remainder of the month of June 2022,
12 there are 19 additional merit briefs currently scheduled.

13 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
14 and Court for any inconvenience this may cause.

15
16 Respectfully submitted,

17 Dated: May 25, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

18
19 By: /s/ Jonathan Omar Pena
20 JONATHAN OMAR PENA
21 Attorneys for Plaintiff

22 Dated: May 26, 2022 PHILLIP A. TALBERT
23 United States Attorney
24 PETER K. THOMPSON
25 Acting Regional Chief Counsel, Region IX
26 Social Security Administration

27 By: */s/ Patrick Snyder
28 Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant

(*As authorized by email on May 26, 2022)

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ORDER

Pursuant to the parties' stipulation (ECF No. 9), IT IS HEREBY ORDERED that Plaintiff shall file an Opening Brief by August 5, 2022. All remaining deadlines in the Scheduling Order (ECF No. 3) are extended accordingly.

IT IS SO ORDERED.

Dated: **May 27, 2022**

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE